

## Bond Capital Finance

# Our GDPR Policy & Procedures

### Introduction

The Data Protection Act 2018 controls how your personal information is used by organisations, businesses or the government and is UK's implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data must follow strict rules, the 'data protection principles. They must make sure the information is:

- used fairly, lawfully, and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant, and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction, or damage

Bond Capital Finance holds information relating to identifiable individuals including customers, suppliers, business contacts, employees, and others. The protection of personal data is of paramount importance to us, and we have adopted strong principles in that respect across its entire organisation. This policy will inform you of which personal data we collect, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

### 1. The type of personal information we collect

We collect and use your personal data to the extent necessary in the framework of our activities and to achieve a high standard of personalised services.

We may collect various types of personal data about you, including:

- identification information (e.g.name, ID card, passport numbers, drivers' licence, nationality, date of birth, gender & photographic ID);
- contact information (e.g. postal address and e-mail address, phone number);
- employment information (e.g. employment, employer's name);
- banking, financial and transactional data (e.g. bank account details);

- client relationship.
- data relating to your habits and preferences:
  - data which relate to your use of our products and services in relation with banking, financial and transactional data;
  - data from your interactions with us: (contact reports), our internet websites, our apps, our social media pages, meeting, call, chat, email, interview, phone conversation.

We never ask for personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sexual orientation, unless it is required through a legal obligation.

The data we use about you may either be directly provided by you or be obtained from the following sources to verify or enrich our databases:

- our corporate clients or service providers.

## **Cookies**

Our website uses cookies to gain a better understanding of how you use our site. This helps us to provide you with a better experience when browsing, and allows us to improve usability. For more information on the cookies we use, please refer to our cookie policy.

## **2. How we get the personal information and why we have it.**

### **a. To comply with our legal and regulatory obligations**

We use your personal data to comply with various legal and regulatory obligations, including:

- banking and financial regulations in compliance with which we...
- set up security measures to prevent abuse and fraud;
- detect transactions which deviate from the normal patterns; and record, when necessary, phone calls, chats, email, etc
- prevention of money-laundering and financing of terrorism
- reply to an official request from a duly authorised public or judicial authority.

### **b. To perform a contract with you or to take steps at your request before entering a contract**

We use your personal data to enter into, and perform our contracts, including to:

- provide you with information regarding our products and services.
- assist you and answer your requests.
- evaluate if we can offer you a product or service.

### c. To fulfil our legitimate interest

We use your personal data to deploy and develop our products or services, to improve our risk management and to defend our legal rights, including:

- proof of transactions.
- IT management, including infrastructure management (e.g.: shared platforms) & business continuity and IT security.
- establishing aggregated statistics, tests, and models, for research and development, in order to improve the risk management of Bond Capital Finance Group of companies or in order to improve existing products and services or create new ones.
- personalising our offering to you and that of Bond Capital Finance entities through:
- improving the quality of our banking and financial broker products or services;
- advertising products or services that match with your situation and profile which we achieve. This can be achieved by:
  - segmenting our clients.
  - analysing your habits and preferences in the various channels (emails or messages, visits to our website, etc.)
  - sharing your data with another Bond Capital Finance entity, notably if you are – or are to become – a client of that other entity.
  - matching the products or services that you already hold or use with other data we hold about you; and
  - administer a contest, sweepstakes, giveaway, competition, or other similar marketing campaign or offering promotional games and managing events
  - communicating about our products, services, offers, news, and what we generally do at Bond Capital Finance or other brands managed by us.

- customer service, including responses to your enquiries.
- to improve and personalise your experience on our websites and applications.
- account maintenance including administering any consumer loyalty or rewards programs that are associated with your account.
- to process and ship any prize won through your participation to our promotional games.

#### d. To respect your choice if we requested your consent for a specific processing

In certain cases, we must require your consent to process your data, for example:

- where the above purposes lead to automated decision-making, which produces legal effects, or which significantly affects you. At that point, we will inform you separately about the logic involved, as well as the significance and the envisaged consequences of such processing.
- if we need to carry out further processing for purposes other than those above in section 2, we will inform you and, where necessary, obtain your consent.
- for interaction on social networks for the purposes of running contests.

### 3. Who do we share your personal data with?

To fulfil the aforementioned purposes, we only disclose your personal data to:

- Bond Capital Finance entities (e.g. you can benefit from our full range of products and services);
- Service providers which perform services on our behalf;
- Financial or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law.

### 4. How long do we keep your personal data for?

We will retain your personal data for the longer of the period required to comply with applicable laws and regulations or another period with regard to our operational requirements, such as proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests.

At Bond Capital Finance, your data will be kept for the duration of seven years after contract end-date. If no finance agreement is in place your information will be removed and destroyed after 3 months.

### 5. How we store your personal information

Your information is securely stored at 7 Moulton Park Office Village, 7 Scirocco Close, Northampton, NN3 6AP, or in our associated and secure cloud storage.

- Paper records will be stored securely, such as in locked units.
- Paper records are shredded when no longer required.
- Electronic data is password-protected.
- Strong passwords are used.
- Passwords are not shared.
- Removable media is stored securely, such as in locked units.
- Only secure cloud storage is used, with strong passwords.
- Data is backed up frequently.
- Backup procedures are tested regularly.
- Servers and computers containing data are protected using security software and a firewall.

## 6. What are your rights and how can you exercise them?

In accordance with applicable regulations, you have the following rights:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

## 7. How can you keep up with changes to this data protection notice?

In a world of constant technological changes, we may need to regularly update this Data Protection Notice.

We invite you to review the latest version of this notice online and we will inform you of any material changes through our website or through our other usual communication channels.

## 8. How to contact us?

If you have any questions relating to our use of your personal data under this Data Protection Notice, please contact our data protection officer correspondent who will investigate your query.

Data Protection Team  
Bond Capital Finance  
7 Moulton Park Office Village  
Scirocco Close,  
Northampton  
NN3 6AP

Please include a scan/copy of your identity card for identification purpose.

In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the competent supervisory authority.

## 9. How to make a complaint

If you have any concerns about our use of your personal information, you can make a complaint to using the contact details above.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire, SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>